

# EXHIBIT S

**Paul A. Woodard**

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**From:** Ken Hiller <khiller@kennethhiller.com>  
**Sent:** Tuesday, November 01, 2016 2:32 PM  
**To:** Paul A. Woodard  
**Cc:** sandrews@kennethhiller.com  
**Subject:** Wagner v. Ilecki

Dear Mr. Woodard:

We are considering filing a motion for a protective order relative to the notice of deposition of Seth Andrews. We are at a loss to discern what relevance Mr. Andrews testimony might have to the case. The conversations took place *after* all of the conduct alleged in the complaint. Please advise me of your position this.

Assuming there is some relevance, we would also like to know the extent to which you are willing to restrict the issues that may be addressed at the deposition. As it currently stands, the deposition is open-ended.

I send this email reserving all rights to object to the deposition notice, including whether it was timely and properly served. We continue to believe that your firm must withdraw as counsel for the Defendant, and reserve our rights to seek to disqualify your firm from this case.

Kenneth Hiller  
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